

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda items 3, 4, 6, 7 and 9

CRD05

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS

26th Session

13-17 February 2023

Portland, Oregon, United States of America

*Comments submitted by Indonesia*

#### Agenda Item 3. Matters of Interest Arising from FAO/WHO including JECFA

##### Some of the general considerations from 94<sup>th</sup> Meeting of Joint FAO/WHO Committee on Food Additives (JECFA94)

Indonesia expresses her appreciation to the JECFA for its efforts in conducting risk assessment for veterinary drug residues (VDR). The risk assessment forms the basis for CCRVDF in discussing the risk management options through MRL establishment in food. Indonesia supports the ongoing works including the harmonization of exposure assessment procedures, developing risk-based decision tree approach for the safety evaluation of veterinary drugs, and the formation of eWG involving JECFA and JMPR.

#### Agenda Item 4. Matters of Interest Arising from the joint FAO/IAEA Centre

Indonesia expresses her appreciation to the Joint FAO/IAEA Centre Program. Considering that Indonesia is still lacking in its capacity in controlling the veterinary drug residue (VDR), Indonesia would like to have opportunity in the FAO/IAEA capacity building program on the use of nuclear and isotopic analytical techniques to analyse, test and monitor veterinary drug residues and related food contaminants which covers expert advice, technical assistance, training, analytical methods and opportunities to share knowledge and experiences.

#### Agenda Item 6. MRLs for veterinary drugs in foods

6.1 MRLs for Ivermectin (sheep, pigs and goats – fat, kidney, liver and muscle) at Step 7

6.2 MRLs for Ivermectin (pigs, sheep and goats) and Nicarbazin (chicken) at Step 4

Indonesia would like to express her gratitude and appreciation to JECFA for the risk assessments on ivermectin and nicarbazin, and also support the development of the MRL for ivermectin and nicarbazin. However, considering that more time is needed to make national consultation and national data collection, we propose to retain the discussion on MRL of ivermectin and nicarbazin at the existing step.

#### Agenda Item 7. Extrapolation of MRLs for Veterinary Drugs in Food

Indonesia thanks and support JECFA for its work on extrapolation of MRLs for veterinary drugs (VDR) in foods.

Indonesia agrees:

- to seek advice from JECFA on whether the appropriate M:T value for residues of deltamethrin in bovine milk is 1.
- that the approach for the extrapolation of maximum residue limits for veterinary drugs to one or more species does not allow the extrapolation of the bovine milk MRL for ivermectin to goat and sheep milk.
- to consider ways forward to extrapolate MRLs for residues of veterinary drugs for offal tissues other than kidney and liver.

**Agenda Item 9. Coordination of Work between CCPR and CCRVDF**

Indonesia supports the coordination of work between CCPR and CCRVDF as well as collaboration with JMPR/JECFA to address cross-sectional issues. The coordination work would cover:

- The establishment of harmonized MRLs for edible animal tissues for compound with dual use (as pesticides and veterinary drugs);
- The harmonization for the risk assessment methodologies used by JECFA and JMPR and possibility to conduct a joint evaluation of dual-use compounds;
- Identification and prioritization issues affecting both committees;
- Develop a database of dual-use compounds that can be shared between committees.

Indonesia also encourage CAC to formalize the work between CCPR and CCRVDF to have indicated ways in which collaboration could be achieved.